

From: Simon Markham
To: [Pest Review](#)
Cc: [Geoff Meadows](#)
Subject: Submission by Waimakariri District Council re:Regional Pest Management Plan
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Attachments: [image004.png](#)
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[image008.png](#)
[Submission on Regional Pest Management Plan July 2017.DOCX](#)

Please see attached submission.

Regards, Simon

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Submission to Environment Canterbury

**On the proposed Canterbury Regional Pest
Management Plan**

Submission by

Waimakariri District Council

July 2017

Person for Contact: Geoff Meadows (Policy Manager)



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Are you submitting on behalf of an organisation? Yes [X] No []

If yes, which organisation are you submitting on behalf of?

Waimakariri District Council

1 Introduction

Thank you for the opportunity to comment on the proposed Canterbury Regional Pest Management Plan 2017-2037 that has been prepared under the *Biosecurity Act 1993*.

The Waimakariri District Context

The Waimakariri District lies to the north of the Waimakariri River in North Canterbury and extends from Pegasus Bay in the east to the Puketeraki Range in the west. It is bounded to the north by the Hurunui District.

The major urban areas are Rangiora and Kaiapoi. There are other urban settlements including Woodend/Pegasus and Oxford, as well as a number of village and beach settlements.

The District had a population of 49,989 as at the March 2013 census, and an estimated 57,800 as at 30 June 2016. The District has experienced a rapidly growing population that is projected to continue to increase in the short to medium term.

Further to this Council's comments on the *Canterbury Regional Pest Management Review Discussion Document* of January 2016, the proposal for the Canterbury Regional Pest Management Plan 2017-2037 is generally supported by this Council.

2 Specific Comments on the Proposal

a) Responsibilities and Obligations

The proposed approach to pest management outlined on page 11, that emphasises that pest management is an individual occupier's responsibility, is fully supported. This of course flows on to the requirement that Territorial Authorities are required to control pests on land that they occupy. In addition, focusing more on preventing new pest plants and animals entering the Region, and placing more responsibility on individual landowners to manage pest plants and animals on their properties themselves, is commendable and supported. The shift in emphasis away from focusing solely on pest plants and animals that impact on production land, to also incorporating managing pest plants and animals for biodiversity outcomes, is also supported.

The table on page 13 (table 2) setting out the responsibility for plant pests on road reserves for each Territorial Authority in Canterbury brings welcome clarity to this issue. This records in the case of Waimakariri District that adjoining land occupiers have full responsibility for controlling plant pests on formed and unformed road reserves which is supported.

This Council agrees that it is sensible and reasonable that scarce biosecurity resources are prioritised, and that the Regional Council concentrates on programmes focused on prevention, early intervention, and pest risk pathway management. In addition, the acknowledgement that for some pest plants and animals, eradication or even effective containment is not feasible, is a welcome and sensible policy setting.

b) Pest Management Framework

Setting out the five pest management programmes on page 18 is clear and directs readers and users of the plan to how the desired control levels are to be achieved

It is pleasing to see that the directions on Good Neighbour Rules contained in the *National Policy Direction for Pest Management 2015*, and setting out the requirements that must be met for the rule to bind the Crown, are included in the proposed Pest Management Plan.

However with the increasing emphasis on individual land holder responsibility, an extension network of biosecurity staff that informs and advises landholders of best-practice pest management (or assists with incorporating biosecurity measures into farm management plans) would be a welcome initiative. This is alluded to under Advocacy and Education on page 19.

The Plan is greatly enhanced by the pictures, together with a description and the adverse effects, of each of the pest animal and plant species to be managed under each pest management programme. This makes the document user-friendly, readable, practical and useful.

c) Monitoring

The monitoring objectives set out in table 32 on pages 68-70 are sensible and practical. This Council has an interest in the proposed operational plan that is to be prepared within three months of the commencement date of the Plan, and in the report on the operational plan each year.

d) Effects and Funding Analysis

The analysis of costs and benefits by pest types as set out in Table 31 in pages 76-80 provides a sensible overview of the analysis of costs and benefits undertaken. The assessment of the effects on the environment in section 9.3.2 is a little light, and could do with some more in-depth description of the environmental benefits to Canterbury that will flow from implementing the Plan.

4. Summary

Overall the proposed Canterbury Regional Pest Management Plan is a logical and readable document that clearly sets out a practical, user-friendly and cost-effective blueprint for managing pests in the Region.

WDC wish to be heard in support of this submission.